

ORIGINAL

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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NOV - 1 2004

Federal Communications Commission
Office of Secretary

In the Matter of)

Broadcast Localism)

MB Docket No. 04-233

DOCKET FILE COPY ORIGINAL

To: The Commission

COMMENTS OF CITADEL BROADCASTING COMPANY

Citadel Broadcasting Company ("Citadel"), by its attorneys, hereby submits its comments in response to the Commission's Notice of Inquiry in the above-captioned proceeding (the "Notice"). As discussed below, the Commission's current regulatory scheme properly sought to avoid the "straight-jacket" of behavioral regulation to promote localism and instead achieved that goal by affording broadcast licensees the flexibility to address the needs and interests of their communities in inventive and inspiring ways. This deregulatory, market-driven approach has proved remarkably successful, as is amply demonstrated by the attached summary of the issue-responsive programming and other community service activities undertaken by the various Citadel stations throughout the country.

I. Radio Content Deregulation

Although the concept of localism has been an integral part of broadcast regulation, the Commission has long recognized that broadcasters should be afforded the flexibility to tailor their programming to the needs and interests of their listeners as a means of serving their diverse communities. *Deregulation of Radio*, 84 FCC 2d 968, paras. 58-68 (1981) ("*Radio Deregulation Order*"). Indeed, after specifically rejecting "regulations that straight-jacket all stations into the same mold" (*Radio Deregulation Order* at para. 68) more than twenty years ago, the

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Commission wisely eliminated its non-entertainment programming guidelines, and only required that stations offer programming that is responsive to the needs and interests of the station's community of license. *Radio Deregulation Order* at paras. 119-123.

The deregulation of radio content was spurred in large measure by the dramatic increase in the number of radio stations between 1934 and 1981. *Radio Deregulation Order* at para. 2. In this competitive environment, the Commission properly realized that content regulation "of necessity would be standardized nationwide, would be relatively inflexible, and would be likely to impose costs without compensating benefits." *Radio Deregulation Order* at App. D, para. 10. In fact, the Commission observed that "to require programming aimed at unrevealed needs, which are difficult to determine, at the expense of programming that is clearly demanded by the public, is to replace the judgment of the government for that of the public." *Radio Deregulation Order* at App. D, para. 26.

The Commission therefore rejected program content regulation and instead concluded that for broadcasters to effectively compete in the increasingly competitive radio marketplace, they must "specialize to attract an audience so that they may remain financially viable." *Radio Deregulation Order* at para. 2. As the Commission explained, "more issues can be addressed through [] specialized programming than through a generalized 'something for everyone' requirement." *Radio Deregulation Order* at para. 48. To achieve this goal, it was necessary and proper that broadcasters be given "the maximum flexibility to be responsive to issues important to their listeners, with the minimum amount of governmental interference." *Radio Deregulation Order* at para. 25. This approach reflected the Commission's determination that market forces, not generic content regulations, would more effectively promote the underlying goals of this proceeding – program content that serves the needs and interests of a station's community of license. *Radio Deregulation Order* at paras. 115-119

II. Market Forces, Not Content Regulation, Promotes Localism

The rationale in 1981 for rejecting the straight-jacket of inflexible behavioral regulation is even more compelling today. In the 23 years since the adoption of the *Radio Deregulation Order*, more than 5000 new radio stations have commenced service. Audio Division, Federal Communications Commission, *Broadcast Station Totals* (as of June 30, 2004), available at <http://www.fcc.gov/mb/audio/totlas/bt040630.html>. Other traditional sources of news and information, such as broadcast television and weekly and alternative newspapers, have experienced growth on a similar scale, and cable television and DBS now offer hundreds of new channels, including channels offering both local and national news and discussion, to an ever-increasing audience. Moreover, the Internet, which has become commonplace in American homes, schools, and workplaces, and satellite radio, which offers hundreds more audio channel selections to American consumers, have provided the public with access to diverse and antagonistic viewpoints on a scale unimaginable at the time of the release of the *Radio Deregulation Order*.

Radio broadcasters operate in a fiercely competitive marketplace. As the Commission correctly recognized in 1981, competition creates a powerful economic incentive for broadcasters to differentiate themselves through programming responsive to the needs and interests of the communities they serve. These market forces achieve the Commission's localism goals more effectively than, and obviate the need for, standardized government regulations that are far removed from local audiences.

The economic viability of a radio station hinges on its ability to serve its community of license through issue-responsive programming and other efforts to connect with listeners through community outreach efforts. Citadel's radio stations have responded to these market forces in precisely the way envisioned by the Commission in the *Radio Deregulation Order* - by

supplying programming that is responsive to the needs and interests of their communities, and by being active and responsible members of those communities through their sponsorship and support of, and involvement in, a wide variety of community events and causes. A summary of those programming and community service efforts is attached hereto.

CONCLUSION

As demonstrated by the Citadel stations, radio broadcasters are achieving the Commission's broadcast localism goals by being responsive to and serving their local communities. It is therefore unnecessary for the Commission to impose program content regulations, which would only make it more difficult for these stations to continue to serve their communities in the manner they do today and still remain economically viable. Citadel therefore urges the Commission to refrain from adopting policies, practices, or rules governing broadcast stations' program content.

Respectfully submitted,

CITADEL BROADCASTING COMPANY

By: 

Steven A. Lerman

Nancy A. Ory

John D. Poutasse

Leventhal Senter & Lerman PLLC
2000 K Street, N.W. Suite 600
Washington, DC 20006-1809
(202) 429-8970

November 1, 2004

Its Attorneys

LOCALISM IN ALBUQUERQUE, NM

News Programming

KKOB

KKOB broadcasts 30 minutes of locally produced news per week, Monday – Friday in the morning and evening drive times. It obtains news from KKOB-TV, AP, Metro News, and various news websites.

KBZU

KBZU broadcasts 40 minutes of locally produced news per week, 6-10 am Monday – Friday. It obtains news from KOAT-TV, AP, and Metro News.

KMGA

KMGA broadcasts 30 minutes of locally produced news per week, 6-7 am Monday – Friday. It obtains news from KKOB-TV, AP, Metro News, and various news websites.

KNML

KNML broadcasts 40 minutes of locally produced news per week, 6-10 am Monday – Friday. It obtains news from KKOB-TV, AP, and Metro News.

KRST

KRST broadcasts 50 minutes of locally produced news per week, 6-9 am Monday – Friday. It obtains news from KOAT-TV, KKOB-TV, AP, Metro News, and various news websites.

KTZO

KTZO broadcasts 45 minutes of locally produced news per week, 6-9 am Monday – Friday. It obtains news from KOAT-TV, AP, and Metro News.

KKOB

KKOB broadcasts 22 hours of news per week, 5.5 of which are locally produced. It obtains news from ABC, AP, Metro News, and various news websites.

KTBL

KTBL broadcasts 16.5 hours of news per week, 2.5 of which are locally produced. It obtains news from KOAT-TV, AP, and Metro News.

Community Programming

Cluster

All Albuquerque stations air PSAs. The PSAs are obtained from civic groups, national organizations, government entities, and some are locally produced. The PSAs air daily throughout the day.

KKOB, KBZU, KMGA, KNML, KRST, KTZO, AND KTBL

These stations all air “Weekly Edition” on Sunday mornings. It is a locally produced public affairs program that focuses on addressing issues raised in the stations local ascertainment interviews.

KKOB

KKOB airs several locally produced community service programs. “Larry Ahrens Show” airs 9-10 am Monday – Friday, and “Jim Villianucci Show” airs 3-7 pm Monday – Friday. Both programs focus on news and public affairs. “Albuquerque Mayor Program” airs 1-2 pm on Saturdays. This is a program where callers ask questions to the Mayor of Albuquerque. “Quality NM” airs at 6 pm on Sundays, and focuses on New Mexico businesses and schools. “High Tech NM” airs at 10 am on Sundays, and focuses on technology advances in New Mexico and discusses opportunities to be a part of the technology scene.

KKOB has also won several awards, including “Jim Villianucci Show” which won “One of America’s Top 100” from Talker’s Magazine. The station also won “News Station of the Year” from the New Mexico Broadcasters Association.

Community Service

KKOB

KKOB has participated in several community service events in the past year, including: Children’s Hospital Miracle Network, Loose Change Collection at Albuquerque Public Schools, Mudd Volleyball to benefit Carrie Tingley Hospital, Underwater Overnight to publicize the Albuquerque Aquarium, Special Olympics, Walk for Diabetes, United Way Campaign, United Blood Services, Cystic Fibrosis fundraisers, Road Runner Food Bank Food Drives, Project Share, The Arthritis Walk, and the Race for the Cure. Kkob also sponsors and promotes local events such as the city’s Multicultural Summerfest and the city’s 4th of July fireworks display.

KBZU

KBZU has participated in several community service events in the past year, including: Mudd Volleyball benefiting the Carrie Tingley Hospital, Harley Toy Run for Kids, Haunted House benefiting the United Blood Services and Project Share, Blood Drives for United Blood Services, United Way Campaign, and the city's 4th of July fireworks display.

KMGA

KMGA has participated in several community service events in the past year, including: Chocolate Fantasy for the New Mexico Museum of Natural History, Boo Ball, United Way Campaign, American Heart Ball, Savi Fair benefiting the Albuquerque Rape Crisis Center, Race for the Cure, Joy Junction Homeless House fundraisers, Roadrunner Food Bank Food Drive, United Blood Services Blood Drive, the city's 4th of July fireworks display, City Easter Egg Hunt, and the River of Lights City Holiday Light Display.

KNML

KNML has participated in several community service events in the past year, including: Mudd Volleyball benefiting the Carrie Tingley Hospital, Sickle Cell Golf Tournament, Special Olympics, Michele Moore Golf Tourney to benefit Casa Esperanze, Kenny Thomas Basketball Camp, UNM Baseball Dugout Cookout benefiting the Ambrose Alday Scholarship Fund, and the city's 4th of July fireworks display.

KRST

KRST has participated in several community service events in the past year, including: Alzheimer's Association, American Heart Ball, Run for the Zoo, Toys for Tots, United Way Campaign, YWCA Week Without Violence, KRST Cares, and the city's 4th of July fireworks display.

KTZO

KTZO has participated in several community service events in the past year, including: Pencil Drive for Iraq, United Way Drive, Mudd Volleyball, Downtown Thursday Night, Artscrawl to promote local artists, United Blood Services Blood Drive, Race for the Cure, Boys and Girls Ranch, Special Olympics, Albuquerque Water Conservation Program, and the Hispano Chamber of Commerce Job Training.

KKOB

KKOB has participated in several community service events in the past year, including: Larry Ahrens Presidential Scholarship Golf Tournament, Chocolate Fantasy benefiting the New Mexico Museum of Natural History, Valentine Charity Ball for New Day

Runaway Shelters, Daffodil Days for Hospice, Laughter is the Best Medicine benefiting the Presbyterian Healthcare Foundation, Weems Artfest Preview benefiting the All Faiths Receiving Home, the Albuquerque International Balloon Fiesta, The Holiday Stroll in Old Town, and the River of Lights City Holiday Light Display.

KTBL

KTBL has participated in several community service events in the past year, including: United Way Campaign, Chocolate fantasy for the New Mexico Museum of Natural History, Valentine Charity Ball benefiting the New Day Runaway Counseling, UNM Presidential Scholarship Tournament to provide money for university students, the city's 4th of July fireworks display, and the River of Lights City Holiday Light Display.

Political Programming

Cluster

All Citadel Albuquerque stations carry advertisements for state and local candidates. The stations also carry free programming and paid advertising for issue advertising. KMGA and KKOZ both carry long-form political programming in advance of elections and political debates.

News and Special Emergency Programming

Cluster

All Citadel Albuquerque stations broke into regular programming when wildfires were raging along the Rio Grande. The stations informed listeners of evacuation and traffic information. In response to these fires, the stations worked with the Red Cross to raise money, food, and clothing to those who lost their homes or were forced to evacuate.

Local Music Initiatives

KTZO

KTZO airs music by small label/unsigned and local artists. It provides a local access program to musicians in which they are asked to provide their music. The entries are judged, and the winner's music is played on the station.

LOCALISM IN ALLENTOWN/BETHLEHEM, PA

News Programming

WCTO

WCTO airs 52 minutes of news programming per week, which is aired between 5 am - 8:30 am, Monday through Friday. All of the news programming is locally produced.

WLEV

WLEV airs 50 minutes of news programming per week between 5 am - 9 am. All of this news programming is locally produced.

Community Programming

WCTO

WCTO airs a program "Lehigh Valley Sunday Morning" that is a public affairs program. It airs Sundays from 5-5:30 am. The program focuses on local news stories and current community concerns and issues. The program is entirely locally produced.

WCTO airs PSA's regularly, once per day-part, seven days per week. The PSAs are both locally produced, from civic groups, and produced by national organizations. WCTO also has produced PSAs itself in response to recent floods, which provided information to flood victims.

WLEV

WLEV airs a program "Lehigh Valley Sunday Morning" Sundays at 6 am that is a public affairs program. The show focuses on issues of local importance, and it entirely locally produced.

WLEV airs PSAs regularly seven days per week. The PSAs are both locally produced, from civic groups, and produced by national organizations. WLEV also has produced PSAs itself in response to recent floods that provided information to flood victims.

Community Service

WCTO

WCTO participates in several local and charitable events. They include a Radio-Thon for St. Jude's Children's Hospital, "Quest for A Million Coins" benefiting St. Jude's Children's Hospital, "Toys for Tots" Golf Tournament and Toy Drive, Warren County Law Enforcement Days, "Locks of Love" benefiting the American Cancer Society, the Tiger Woods Foundation Golf Benefit, which helped bring Tiger Woods to Allentown, PA. WCTO also airs PSAs for several different walks benefiting cancer foundations, including the "Soleroderma Walk", and participates in these walks.

WCTO

WLEV participates in several local and charitable events, including “Teacher of the Week”, “Toys for Tots” toy drive, ALS Walk, Marine Corps Golf Tournament, Tiger Woods Foundation Golf Benefit, which helped bring Tiger Woods to Allentown, PA, and has collected teddy bears for area hospitals and children’s homes for “Feel Better Bears”, and the Citadel Communications Golf Tournament to benefit St. Jude’s Hospital.

Political Programming

WCTO

WCTO carries advertisements for state and local candidates for public office; however, the station limits the races for which they run state and local spots.

WLEV

WLEV carries advertisements for state and local candidates for public office; however, the station limits the races for which they run state and local spots.

News and Special Emergency Programming

WCTO

Within the past two years, WCTO has interrupted regular programming to carry extended news coverage of the capture of Saddam Hussein and the funeral of Ronald Reagan.

WCTO has also raised money for flood victims, and raised money for victims of a chemical spill in Bethlehem, PA. They have also added more traffic updates and aired updates from the Bethlehem Police Department during the afternoon drive.

WLEV

Within the past two years, WLEV has interrupted regular programming to carry extended news coverage of the capture of Saddam Hussein.

Local Music Initiatives

WCTO

WCTO airs music from small labels and unsigned artists and integrates these artists into its rotation. It also held a “Battle of the Bands” contest the first week in August, where the “Local Person” won a contract with a record label. WCTO promotes local and unsigned artists by giving away their CD’s in “Win it Before you Buy it” contests. They also give away tickets to see these local and unsigned artists.

LOCALISM IN AUGUSTA/WATERVILLE, ME

News Programming

WEBB and WMME

WEBB and WMME broadcast approximately 205 minutes of news programming weekly. These locally produced new segments are aired during the Morning Drive and Sunday morning programs. Programming is pulled from newspapers and the internet.

WTVL and WJZN

WTVL and WJZN broadcast approximately 110 minutes of locally produced news programming per week. Programming, which is pulled from both newspapers and the internet, is aired during the Morning Drive and Sunday morning programs.

Community Programming

Cluster

On Sunday mornings from 6 am – 6:30 am, each of the Citadel Augusta/Waterville station airs public service programming which deals with issues of general interest to the community. The subjects of these programs are decided through personal contact with public service organizations and from news reports. The stations have received special recognition and certificates from numerous groups acknowledging the success of the program.

Each of the stations also airs public service announcements. PSAs are broadcast throughout the day on each of the stations and are locally produced from local civil groups. A wide variety of issues are addressed during these PSAs. Issues include Breast Cancer Awareness, Habitat For Humanity, Salvation Army and Muscular Dystrophy.

Community Service

Cluster

The stations also work to benefit local and charitable organizations. All four stations volunteer to host and help out at local events. Both WMME and WEBB conduct interviews at least once a week during the Morning Show with various members of charitable organizations and coordinators of local events. Events that the stations have participated include: Special Olympics Request-A-Thon, Salvation Army Christmas Castle, United Way Days of Caring, Augusta Area Jaycees Haunted House, Capitol Area Project Graduation, Team Cony/Team Hall-Dale, "Tanks" Giving, and the MDA Labor Day Events.

Political Programming

Cluster

All Augusta/Waterville stations carry advertisements for state and local candidates for public office, and they do not limit the races for which they carry such advertising, or the number of spots or times. The stations also carry all issue advertising.

News and Special Emergency Programming

Cluster

The stations react to major events, and ensure that their listeners are fully informed.

Local Music Initiatives

Cluster

The music stations play local music periodically throughout programming in conjunction with interviews with the artists.

LOCALISM IN BATON ROUGE, LA

News Programming

WXOK

WXOK airs 30 minutes of locally produced news programming each week at various times throughout the morning and afternoon. News is pulled from a variety of sources including the Metro Source News, various locally based websites, The Advocate newspaper and other area newspapers.

KOOJ

KOOJ broadcasts a total of 60 minutes of locally produced news programming each week. These broadcasts are aired Monday thru Friday mornings from 6:00 am – 8:00 am.

KQXL

KQXL broadcasts 30 minutes of news programming each week. All news programming is locally produced and aired Monday through Friday at 12:00 pm, 5:00 pm, and 6:00 pm. To compile its news content, the station relies on various local newspapers and local websites.

WBBE

WBBE airs 15 locally produced news segments each week. Each news segment, which is aired Monday thru Friday at 6:00 am, 7:00 am, and 8:00 am, lasts for 60 seconds. News is pulled from the Associated Press, The Advocate, Yahoo! News, and Weather.com.

WIBR

WIBR broadcasts 5 hours of locally produced news programming each week. News segments are aired 24 hours per day.

Community Programming

WXOK

“Glorious Morning Show” is a locally produced talk show that deals with community driven issues. It airs Sunday mornings from 10:00 am – 10:30 am. Subjects are decided upon by the producers and host after solicitation from show guests and community leaders. Each week the station receives numerous email and faxes from people asking to be involved in the show.

In addition, the station broadcasts public service announcements, which are locally produced and also obtained from national organizations. PSAs are aired Monday thru Saturday, one per hour.

KOOJ

KOOJ airs a variety of locally produced, community service programs. "AM Sunday" is a half hour public affairs program that deals with various subject matters of local importance. The Public Service Director decides upon program subjects. "All Request Nooner" is aired Monday thru Friday from noon – 1:00 pm. Listeners call into the show and make requests and provide input on various topics. On Sunday evenings, the station airs "Red Stick Rock Show," in which interviews are conducted with local musicians. The "Work Release Program" is another request show in which listeners can call in and provide input.

The station is also actively involved in the airing of public service announcements. These PSAs are locally produced and obtained from national organizations.

KQXL

On Sunday mornings, KQXL airs "Inside Baton Rouge," a show dealing with current events and issues. The program is an interview style program in which community events are shared with listeners. On Wednesday evenings, "Southern University Show" provides listeners with a question/answer style show that deals with issues at Southern University. Both of these programs are locally produced.

Additionally, KQXL has developed PSA campaigns for local issues such as the Louisiana Family Forum and Alcoholics Anonymous/Alanon.

WBBE

"Inside Baton Rouge" is a locally produced program that airs on Sunday mornings. The program deals with public affairs and community events. The show features many guests who are booked by the public affairs director and topics are always local.

WBBE also airs public service announcements 7 days a week. The station solicits PSAs on air and collects them by fax and email.

WIBR

WIBR airs a variety of locally produced community service programming. On Saturday afternoons, the station broadcasts "The Business Connection Show," a locally hosted call-in program. The program provides listeners with small business start-up assistance. Weekday mornings, listeners can tune into the "Clay Young Show," which is a caller and issues driven talk show. In the afternoons during the week, listeners can find the "Ed Buggs Show," which is another caller driven issue talk show. The issues addressed are determined by what listeners want to hear and past guests of the shows. The "Ed Buggs Show" has been voted Favorite Talk Show by the Business Report Magazine in Baton Rouge. The station also airs public service announcements throughout the day.

Community Service

WXOK

WXOK has been involved with many community service activities such as Pennies from Heaven and the Southern University Fundraiser. WXOK also participates in and sponsors numerous activities that give back to the community. Such events include back to school drives for underprivileged children, holiday food drives, and toy drives during the holiday season.

KOOJ

KOOJ has been involved with activities such as the Harley Raffle for MDA, the Rock and Roll Up Your Sleeve Blood Drive, Stanford Wilson Good Samaritan Fundraiser and "The Trend" Charity Concert.

KQXL

KQXL works closely with local and charitable organizations. Events in which the station participates include Holiday Helpers (a canned food drive for Thanksgiving and toy drive for Christmas), the Southern University Radiothon, which raises money for student scholarships, voter registration drives, and back to school supply drives. Furthermore, the Juneteenth Celebration is a free concert for the community sponsored by the station that celebrates music.

WBBE

WBBE is also involved in events such as the Muscular Dystrophy Association's Telethon and Dance-A-Thon, the Louisiana Public Broadcasting Telethon, Fest for All, and March of Dimes Walk. In addition, the station has provided free broadcast remote appearances and engaged in job shadowing for underprivileged youths.

WIBR

WIBR has been involved with many community service events such as the Thomas Delpit Community Improvement Show and the fundraiser for Officer Vicki Wax who was killed in the line of duty. The fundraiser for Officer Vicki Wax raised money for her funeral and for her family.

Political Programming

WXOK AND KQXL

WXOK and KQXL carry advertisements for state and local candidates for public office as well as political debates. The stations do not limit the races for which they are willing to carry spots, nor do they limit the number and times of spots available.

KOOJ

KOOJ carries advertisements for state and local candidates, however it limits the number of spots and times available for airing such advertisements.

WBBE

WBBE also carries advertisements for state and local public office candidates. They also provide paid time for issue advertising.

WIBR

WIBR does carry political debates as well as advertisements for local and state candidates for public office. The station also carries issue advertising.

News and Special Emergency Programming

Cluster

All of the Citadel Baton Rouge stations have interrupted regular programming to carry extended news coverage. Events that have prompted this included the Iraqi liberation, Hurricane Ivan coverage, the Mayoral Debate, and the Columbia shuttle explosion. During the hurricane, many of the stations were involved with food drives, blood drives and shelters.

Local Music Initiatives

WXOK

WXOK airs approximately 30 minutes of unsigned/small label and local artists daily.

KOOJ

On Sunday evenings, KOOJ airs the music of local artists. During the morning show, the station has a "Local Licks" segment that features songs and interviews with local musicians. Four times throughout the day, the station has a "Red Stick Rock Report" in which it lets its listeners know who is playing where in the Baton Rouge area. The station is very involved with promoting local artists at local venues.

KQXL

Listeners of KQXL can hear local music (called "Southern Soul" by the station) Monday thru Friday afternoons Sunday evenings and Saturday mornings. During these times the station plays "Southern Soul" music.

LOCALISM IN BINGHAMTON, NY

News Programming

WAAL

WAAL airs 30 minutes of locally produced news programming 6-8 am Monday - Friday.

WHWK

WHWK airs 70 minutes of locally produced news programming per week, 5:30-8:50 am Monday – Friday. The station pulls news from the WNRF.

WWYL

WWYL airs 90 minutes of locally produced news programming per week, 6-10 am Monday - Friday. The station pulls news from the AP, local newspaper, and local television stations.

WYOS

WYOS airs 650 minutes of news, 130 minutes of which are locally produced, per week Monday - Friday. The station pulls news from the AP Wire Service.

WNBR

WNBR airs 1,190 minutes of locally produced news programming per week, 5 am - 6 pm Monday - Friday. The station pulls news from the AP Wire Service.

Community Programming

Cluster

All stations in the New Orleans cluster play PSAs throughout the day. The stations obtain the PSAs from civic groups, national organizations, and locally produce some as well.

WAAL, WWYL, AND WYOS

“Southern Tier Close Up” airs Sundays at 6 am, and is a locally produced community affairs program.

WNBR

“Encounter” airs Saturdays at 6 am, and is a locally produced community affairs program that focuses on community service. “Woman to Woman” airs Sundays at 6 am, and is a locally produced program that focuses on women’s issues and concerns.

Community Service

WAAL

WAAL participates in several community service programs and events. A few that it has participated in the past twelve months include: Chow Food Drive, German Shepherd Rescue, Diabetes Association Walk, and the AIDS Walk.

WHWK

WHWK participates in several community service programs and events. A few that it has participated in the past twelve months include: Quest for a Million Pennies and the Roofsit for Volunteers of America.

WWYL

WWYL participates in several community service programs and events. A few that it has participated in the past twelve months include: Binghamton University Homecoming Parade, Binghamton Idol 2004, Pepsi Challenge Walkathon, Danielle 5K, Charity Softball, and Walk America.

WYOS

WYOS participates in several community service programs and events. A few that it has participated in the past twelve months include: Chow Hunger Walk, American Heard Walk, Children’s Home of Wyoming Conference Ice Cream Social, and the American Diabetes Walk.

WNBR

WNBR participates in several community service programs and events. A few that it has participated in the past twelve months include: Chow Hunger Walk, American Heard Walk, Children’s Home of Wyoming Conference Ice Cream Social, Cruizin Palloza, Children’s Home 5K run, and the American Diabetes Walk.

Political Programming

WAAL, WHWK, WWYL, AND WYOS

These stations carry advertisements for state and local candidates for public office. They do not limit the races for which they carry these spots, or the number of spots they play for each candidate. The stations also air paid issue advertising.

WNBR

WNBR carries advertisements for state and local candidates for public office. It does not limit the races for which it carries these spots, or the number of spots it plays for each candidate. WNBR carries long-form political programming in advance of elections, as well as political debates. The station also airs paid issue advertising.

News and Special Emergency Programming

Cluster

All Citadel Stations in Binghamton have interrupted regular programming for news updates in the past year, including severe weather alerts and updates, news coverage of the Columbia Space Shuttle explosion, updates on the war in Iraq, and news about the blackout in 2003.

Local Music Initiatives

WHWK AND WWYL

WHWK and WWYL try to include local and small label/unsigned artists in their rotation. The stations also put local acts as openers of large concerts that the stations produce.

LOCALISM IN BIRMINGHAM, AL

News Programming

Citadel Birmingham airs 190 60 second local newscasts per week airing 6 am -7 pm and 120 60 second national newscasts per week airing 24 hours per day. These newscasts utilize local reporters, wire services, newspapers, and local TV news departments. Local newscasts have won AP awards.

Community Programming

The Citadel Birmingham stations air the following community service programs. "Birmingham Today," a weekly 30 minute program produced locally, which airs Sunday mornings, focusing on the needs of the community; (ii) "In Your Ear" with Frank Matthews, a talk show covering local city politics that has received praise from the Mayor of Birmingham. This show airs Monday – Friday 7-9 pm. Local high school football airs Fridays during the season at 7 pm. "The Breakfast Club" on WAPI, is a morning show that covers various local events. This show airs Monday – Friday 6-9 am. "The Richard Dixon Show" on WAPI, an afternoon news show airing Monday – Friday 4-7 pm.

Local needs are ascertained by interviewing local community leaders. All programs are locally produced. Citadel Birmingham continually solicits input from community leaders. Nine people and are used in the production of these programs.

Citadel Birmingham obtains PSAs through the mail and as a result of its staff's involvement with local organizations. The stations produce these PSA's and also air PSA's that are pre-produced. They average 30 per day, 24 hours per day, 7 days a week. These PSA's cover campaigns for both local and national issues. The stations air approximately 210 PSA's per week.

Community Service

The stations' staff and facilities are used to promote, bring awareness to and raise money for various causes in need, including:

"Fallen Officers Fund Raiser" on 6/17/2004, over \$5,000 was raised for the families of three police officers killed in action. Over \$30,000 in promotional airtime was used to promote this event.

"The X Lounge CD", now in its 6th year, is a fundraiser for United Cerebral Palsy, and has generated over \$1.2 million dollars. It is the largest fundraiser for the Birmingham UCP. Over \$100,000 in promotional airtime is used each year, October – December, to promote this event.

"JOX Golf Tournament" in June of 2004, raised over \$4,000 for MDA. Over \$25,000 in promotional airtime was used to promote this event.

The Citadel Birmingham stations have also supported and promoted several other events, including: UAB golf tournament, "Angel Tree", "Bruno's Memorial Classic", Ronald McDonald House, Safe House Shelter, Habitat for Humanity, "Sugar Bug Shootout for Diabetes", John Croyle Big Oak Ranch for Children, "Cystic Fibrosis Light the Night", City Stages, US Women's Soccer Team, "Jessie's Place", and the Jimmy Hale Mission.

Political Programming

Citadel Birmingham carries local advertisements for state and local candidates. They do not limit the races or the number of spots, and do not carry long-form political programming, but do carry political debates. The stations do not provide free time to candidates for their use during times other than on station produced programming, and they carry paid and provide free time for issue advertising, and accept all such programming.

News and Special Emergency Programming

During hurricane Ivan, the Citadel Birmingham stations provided continuous emergency coverage that was produced internally and aired on all stations from 11 am-7 pm. The stations are also involved in Amber Alerts, severe weather coverage and will be involved in an upcoming school supply drive for victims of this Fall's hurricanes.

Local Music Initiatives

Local and unsigned artists are featured in a show called "Reg's Coffee House" which airs Sundays 10 am-1 pm, and in a show called "Locals at 11" which airs Sundays at 11 pm.

LOCALISM IN BOISE, ID

News Programming

KIZN

KIZN broadcasts 90 minutes of news Monday – Friday from 6-9 am. Ninety percent of the news is locally produced. The staff reporter utilizes the services of the Idaho Statesman Newspaper, FoxNews.com, Reuters, the Drudge Report, Idaho Press Tribune, CMT.com, and USA Today.

KZMG

KZMG broadcasts 5 locally produced newscasts per week, Monday – Friday at 7 am. The staff uses the Idaho Statesman Newspaper, “The Complete Sheet” Prep Service, CNN.com, and IdahoStatesman.com as sources of news.

KKGL

KKGL broadcasts 20 minutes of locally produced news per week, Monday – Friday, during morning show, from 6-8 am.

KQFC

KQFC broadcasts 1 hour of locally produced news per week from 6-8 am Monday – Friday.

Community Programming

Cluster

All Citadel Boise stations air PSAs that are obtained from civic groups, national organizations, and ones that are locally produced. PSAs are broadcast throughout the day, seven days per week. The stations created a PSA campaign for “Call to Duty” that helped raise money for round trip airfare for National Guard and Reserve soldiers to be able to return home to Idaho on leave, before being deployed to Iraq.

KIZN

“Issues Today” airs Sundays from 5 – 5:30 am, and is dedicated to local environmental, education, and family issues. “Viewpoints”, a public affairs program, airs Sundays from 5:30 – 6:30 am.

KBOI

“Issues Today” airs Sundays from 5 – 5:30 am, and is dedicated to local environmental, education, and family issues. “Viewpoints”, a public affairs program, airs Sundays from 5:30 – 6:30 am. “HomeScape Radio” is a locally produced self-help home improvement program that airs on Saturdays from 9-10 am. “Property Line Today” is a locally produced self-help real estate program that airs on Saturdays from 10-11 Am. “Zamzows

Garden Show” is a locally produced self-help gardening program that airs on Saturdays from 11 am – 12 pm.

KTIK

“Issues Today” airs Sundays from 5 – 5:30 am, and is dedicated to local environmental, education, and family issues. “Viewpoints”, a public affairs program, airs Sundays from 5:30 – 6:30 am.

KZMG

“Issues Today” airs Sundays from 5 – 5:30 am, and is dedicated to local environmental, education, and family issues. “Viewpoints”, a public affairs program, airs Sundays from 5:30 – 6:30 am.

KKGL

“Issues Today” airs Sundays from 5 – 5:30 am, and is dedicated to local environmental, education, and family issues. “Viewpoints”, a public affairs program, airs Sundays from 5:30 – 6:30 am.

Community Service

KIZN

“What Can Mee Do for You?” is a morning show project where listeners alert the show to people that need help (either financially or materially) and the show arranges to get them what they need. “Operation Kissin’ Cares” is involved in several community service projects including “Keep Kids Warm” and “Call to Duty”. KIZN created “Keeping Kids Warm,” which is a grass-roots charity that raises money for three social service agencies that use the money to pay heating and utility bills for families in need during the winter months. Other events KIZN is involved with include: “See Spot Walk” which is a dog walk-a-thon to raise money for the Idaho Humane Society, Wes Evans Ride which is an annual charity motorcycle ride to raise money to help fight ALS and Lou Gherig Disease, the MDA Walk-A-Thon, D.A.R.E. rallies, and Career Day events at local schools.

KBOI

KBOI is also involved with several community service events including “Call to Duty” and “Coats for Kids”.

KTIK

KTIK has participated in several community service events, including: “Call to Duty”, Meridian Kiwanis Mayday Kite Festival fundraiser, Family Advocate Program Sumo Challenge, Cobble Field Crossing Coat Drive, the West Valley Little League Weekend,

Blow the Whistle on Asthma Walk, Boise Seminoles American Legion Fundraiser, Gather of Chefs fundraiser for Ray Diulo, and the Make a Wish Foundation.

KZMG

KZMG has participated in several community service activities in the past year, including: "Polar Bear Plunge", Wishing Star Radiothon, Noise! Music scholarships, "Call to Duty", Rock the Vote, and the March of Dimes "Mud Football".

KKGL

KKGL has participated in several community service activities in the past year, including an Auction for Idaho Food Bank and the Angel Tree for Idaho Youth Ranch.

KQFC

KQFC has participated in several community service events in the past year, including: Wagner Family Farms Treasure Valley Pumpkin Festival, Mr. Car Wash Witches and Washes, Southwestern Builder Trade Union Glow Stick Giveaway, Boise State Football, Adopt a Family, Kids Fair, St. Luke's Red Dress Fundraiser, Horse Affair, Karnations for Kids, Heart Ball, Deer Hunters of Idaho, Cattleman's Association Fundraiser, Bon Appetite on the Grove, Boise Rescue Mission, fundraiser for Annabelle's surgery, CMN Radiothon, Rally for Wildlife, Warhawk Museum, MS Walk, Eagle Rodeo, Listener Appreciation Concert, Eagle Fun Days, Cover the Blue, Griddles and Fiddles, Women's Rodeo, Snake River Stampede, Canyon County Fair, Kuna Days Gem County Fair, Caldwell Night Rodeo, Western Idaho Fair, Morrison Center, and "Spudfest".

Political Programming

KIZN AND KZMG

KIZN and KZMG carry advertisements for state and local candidates for public office, and do not limit the races for which they will carry spots, or the number of spots or times per candidate.

KBOI

KBOI carries advertisements for state and local candidates for public office, and does not limit the races for which they will carry spots. It also carries long-form political programming and political debates.

KTIK

KTIK carries advertisements for state and local candidates for public office, and does not limit the races for which they will carry spots.

News and Special Emergency Programming

KZIN, KBOI, KZMG, AND KKGL

KZIN, KBOI, KZMG, and KKGL have all interrupted regular programming to carry extended news coverage of events including: Iraq War, President Reagan's passing, and emergency weather alerts.

Local Music Initiatives

KZMG

KZMG broadcasts a locally produced show called "Saturday Night Street Jams," which airs on Saturday nights from 8 pm – 1 am. The show features local and regional artists.